

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

Case No. 1:18-CR-244

vs.

Hon. Gordon J. Quist

KEVIN SCOTT KONEN,

Defendant

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**DEFENDANT'S MOTION FOR A DOWNWARD VARIANCE AND/OR
DOWNWARD DEPARTURE**

NOW COMES the defendant, Kevin Scott Konen, by and through his attorney,
Dodge & Dodge PC, and respectfully moves this Court to depart or vary downwardly from
the calculated guidelines. The reasons which support this Motion are set forth in the
attached Memorandum in Support.

Grand Rapids, MI
April 4, 2019

Respectfully submitted,

/s/ Mark D. Dodge
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